

**VERONICA A.F. NEBB**

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Attorneys for Defendant CITY OF VALLEJO

**UNITED STATES DISTRICT COURT**

**EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION**

NEFTALI MONTERROSA, individually and  
as co-successor-in-interest to Decedent SEAN  
MONTERROSA; NORA MONTERROSA,  
individually and as co-successor-in-interest to  
Decedent SEAN MONTERROSA;  
MICHELLE MONTERROSA, individually;  
ASHLEY MONTERROSA, individually,

Plaintiffs,

vs.

CITY OF VALLEJO, a municipal  
corporation; JARRETT TONN, individually,  
and, Vallejo police officers DOES 1-25,  
inclusive,

Defendants.

**Case No: 2:20-cv-01563-DAD-DB**

**DEFENDANT CITY OF VALLEJO'S  
AMENDED NOTICE OF MOTION AND  
MOTION FOR PROTECTIVE ORDER**

Date: February 2, 2024

Time: 10:00 a.m.

Crtrm: 27

**TO ALL PARTIES AND THEIR COUNSEL OF RECORD HEREIN:**

**PLEASE TAKE NOTICE** that on February 2, 2024, at 10:00 a.m. in Courtroom 27 of  
the above Court, Defendant City of Vallejo will and hereby does move for a protective order to  
limit the scope of Plaintiffs' deposition subpoena issued pursuant to FRCP 30(b)(6).

This motion is based on this Notice of Motion and Motion, the Joint Statement re  
Discovery Disagreement which shall be filed next week, and on such other written and oral

1 argument as may be presented to the Court.  
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3 DATED: December 20, 2023

Respectfully submitted,

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5 /s/ Katelyn M. Knight

KATELYN M. KNIGHT

Attorneys for Defendant

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